



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Clean Air Act Inspection Report

Drafted: August 19, 2022

Finalized: September 13, 2022

EPA Inspector: Davianna Vasconcelos, Environmental Engineer, Air Compliance Section /DMV/

EPA Reviewer: Darren Fortescue, Senior Enforcement Coordinator, Air Compliance Section /DEF/

Date of Inspection: August 18, 2022

Facility Name: Sprague Operating Resources LLC

ICISAir ID#: CT0000000900100013

Facility Location: 250 Eagles Nest Rd, Bridgeport, CT 06607

Mailing Address: Same as above

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Inspection Attendees:

Name	Title	Organization
Davianna Vasconcelos	Environmental Engineer	EPA R1
Hannah Patel	Environmental Scientist	EPA R1
Tyler Kotsifas	Physical Scientist	EPA R1 Lab
Steve Rapp	Senior Engineer	ERG
Mark Potash	Supervising Air Pollution Control Engineer	CT DEEP
Mike Merna	Terminal Manager	Sprague
Simone Wallace	Environmental Specialist	Sprague

Facility/Process Description:

The facility located at 250 Eagles Nest Rd Bridgeport Connecticut was purchased by Sprague Operating Resources LLC (“Sprague”) from Motiva in July 2013.

The facility receives petroleum products, including but not limited to regular gasoline and premium gasoline, from barges and stores the products in 22 tanks, 4 of which are commissioned for gasoline. The facility distributes the products by loading them onto trucks via a loading rack. The facility has the capacity to load heating oil and diesel onto barges but does not have the capacity to load gasoline onto barges.

Number of Employees and Working Hours:

Buckeye employs 9 terminal personnel at the facility and greater than 100 employees in the entirety of the company.

The facility operates 24 hours a day, 7 days a week, for 52 weeks a year.

Potentially Applicable Clean Air Act Requirements:

- 40 CFR Part 63 Subpart R - Hazardous Air Pollutants for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations); certain applicable provisions from 40 CFR Part 60 Subpart Kb – Standard of Performance for Volatile Organic Liquid Storage Vessels apply via Subpart R
- 40 CFR Part 60 Subpart XX - Bulk Gasoline Terminals
- CT DEEP Title V Permit 015-0215-TV

Previous Enforcement Actions:

A “Detailed Facility Report” from EPA’s Enforcement and Compliance History Online database indicates that on December 4, 2020, CT DEEP issued Sprague a Clean Air Act notice of violation; however, the report also indicates that there have been no informal or formal enforcement actions taken by EPA against the facility in the last five years.

Opening Conference:

On August 18, 2022, at 8:15 am, EPA personnel Davianna Vasconcelos, Hannah Patel, and Tyler Kotsifas, ERG personnel Steve Rapp, and CT DEEP personnel Mark Potash arrived at the facility located at 250 Eagles Nest Rd, Bridgeport, Connecticut, and met Mike Merna of Sprague. Ms. Patel presented her credentials to Mr. Merna. Ms. Vasconcelos initiated an opening conference by explaining the purpose of the inspection was to conduct forward looking infrared (“FLIR”) monitoring of the gasoline storage tanks located at the facility, and to monitor

the percent of the lower explosive limit (“%LEL”) of the headspace above the internal floating rooves (“IFR”s) of the gasoline storage tanks.

Mr. Merna explained that the facility had not had power since approximately 6:20 am and as a result, the loading rack was not operating. Mr. Merna explained that the facility has 22 tanks with the contents summarized in Table 1. Mr. Merna said that tank levels and temperatures were recorded at 11:00 pm the night before and the hand-written report was available. Ms. Vasconcelos took a photo of the hand-written notes which can be found in the inspection file. Mr. Merna said that a barge was scheduled to off-load premium gasoline that would be placed in Tank 18. Mr. Merna said Tank 17 would be put on the rack once power was restored.

Table 1: Tank Numbers and Contents

Tank ID Number	Tank Contents
12	Regular gasoline
15	Regular gasoline
17	Regular gasoline
18	Premium gasoline
14	Ethanol
16	Out of service
19	Out of service
22	Out of service
23	Out of service
11	Heating oil
20	Heating oil
21	Heating oil
24	B20
25	Additive
30	Additive
31	Additive
32	Additive
33	Additive
35	Additive
37	Additive
38	Additive
40	Additive

Facility Tour:

Mr. Merna led the group through the tank area where Mr. Kotsifas used the FLIR camera to survey tank vents for emissions and record FLIR video when appropriate. Recorded FLIR videos can be found in the inspection file accompanied by a video log.

Power to the facility was restored at approximately 9:50 am at which time Mr. Merna had facility responsibilities to attend to. Mr. Potash began to calibrate the %LEL monitor but was having

difficulty measuring the calibration gas accurately. Mr. Potash changed the hand-held monitoring device and the calibration gas cylinder. After adjusting the equipment, Mr. Potash was able to measure calibration gas in an acceptable amount of response time. Mr. Merna rejoined inspection personnel and the group began %LEL monitoring. Inspection personnel conducted %LEL monitoring of the headspace of the IFRs on 3 of the 4 gasoline storage tanks: Tank 17, Tank 15, and Tank 12. During the monitoring, the equipment did not read over 0% for %LEL suggesting that the equipment may not have been functioning properly. Monitoring equipment recorded %O₂ levels between 21.2% and 21.6%.

%LEL monitoring data was not available at the time of writing this inspection report.

Records Reviewed:

Ms. Vasconcelos reviewed hand-written notes recording tank fill level and product temperature recored on August 18 at 11:00 pm.

Closing Conference:

Ms. Wallace joined the group for the closing conference. Mr. Merna said that the tanks are taken out of service in either April or May for inspection. Mr. Merna said that Sprague does in-house ambient %LEL monitoring when contractors are working on site but does not monitor %LEL on the valves or within the tanks at the facility. Ms. Wallace said the facility had not had excess emission events or emergency shutdowns in the last 12 months. Ms. Wallace agreed to provide Ms. Vasconcelos the date for the most recent hatch inspection and out of service inspection for the tanks the inspection group monitored. Ms. Vasconcelos thanked Mr. Merna and Ms. Wallace for their time.

Inspection personnel left the facility at 12:45 pm.